Federal Communications Commissioners
Federal Communications Commission
Washington, D.C.

SUBJECT: ET DOCKET No. 92-298 AM STEREO STANDARD

As a Broadcast Technician of record with the Federal Communications Commission and United States citizen I offer these comments on the stated Docket 92-298 re: AM Stereo Standard.

The Federal Communications Commission, in the manner of recent AM Rulemakings which have proven at best ineffective and naive, and at worst disastrous for the AM Broadcast Band has stated its' intention to assign the Motorola AM stereo system as the standard for the United States. This, despite several misstatements and self-contradictions in the 92-298 Docket, may be a lasting decision finally sentencing the AM Broadcast Band to an untimely end. As outlined below, the FCC is about to (a) reduce the useful coverage areas of AM Broadcast Stations; (b) encourage a system of AM Stereo which is unusable by the majority of AM Broadcast Stations; and (c) increase citizen confusion by endorsing radios which false sense phase dependent stereo in an inherently phase unstable medium and also which frequently refuse to decode the stereo matrix due to this phase confusion.

The FCC states in paragraph 4, with absolutely NO documentation or substantiation of claims that "591 stations use the Motorola system...". EVERY broadcast professional knows of several stations which are former users of this system. The FCC has not made any attempt to determine the percentage of these [591] stations who have ceased use of the Motorola system due to the inherent problems of a phase dependent system, vs the number in current use.

The FCC states in paragraphs 5 and 6 that "Adoption of the [Motorola] system as the AM stereo standard would eliminate the remaining uncertainty...". This statement at this time in history is patently false and unproductive. Certainty for the broadcaster and the consumer CANNOT be established pending resolution in the Federal Court System of the litigation of KAHN v. General Motors. As testimony before the Senate Communications Subcommittee stated "...if the suit is successful, the Court can be expected to issue an injunction halting the manufacture of GM AM stereo radios..." and it may be deduced therefrom that an injunction would quickly follow against ALL manufacturers of radios infringing on the KAHN patent. FCC Paragraph 6 which states that "...selection of an alternative to the Motorola system would set back the clock on the implementation of AM stereo service..." is an unsubstantiated claim, the logic of which if applied honestly to the facts of the day WOULD STATE that "selection of an alternative to the (challenged) Motorola system is the only guaranteed method of implementing AM stereo service ...".

Further, Paragraph 6 WOULD continue to state that "Selection of anything BUT an alternative [to the Motorola stereo system] stereo standard thus could conceivably result in discontinuance of the existing stereo service with no replacement." Such a result would be inconsistent with the legislative intent to advance AM stereo service, IN THE FCC' OWN WORDS.

The Federal Communications Commission has recently issued several rulemakings detrimental to AM broadcasting in this country with defiant disregard to the laws of physics, the laws of the marketplace, and the suggestions of professional consulting engineers. The NRSC transmission standard has served only to concentrate the power of AM broadcast stations in the higher audio frequencies which, due to the lack of a mandated NRSC receiver implementation is totally useless to both those receivers in the field and those which are presently on sale several years after the NRSC implementation. In addition, the AM IMPROVEMENT docket has had a cumulative effect of zero on the percentage of listeners to AM radio, the quality of AM receivers, the ability of the AM signal to be heard in buildings, above static and atmospheric noise, and in improving market coverage area sizes to be competitive with FM. Of most interest, the FCC had mandated reducing AM signal strength for "AM IMPROVEMENT" due to co- and adjacent channel interference. The FCC, acknowledging that this will take many years [while others feel many decades is more realistic] to clear AM band interference IS INHERENTLY AN ADMISSION BY FCC PERSONNEL that any [stereo] system which is phase dependent will not be useful for many years, while others feel it will be decades. The most powerful and perhaps ONLY phase stable areas in AM station coverage areas are over and about the U S Post Office and empty downtown areas. These would be the only areas to reliably receive any Motorola-type phase dependent AM Stereo while hindering the ability of AM to compete with FM in suburbs and rural areas.

The decision of the FCC to require a Motorola-type phase dependent AM Stereo system will prevent those scores of AM stations subject to American and international co-channel interference from maximizing their stereo coverage area as phase dependent radios collapse to mono with ground wave and sky wave interference, in some events from the collision of the stations own skywave and groundwave! Further, the phase dependent radios will continue to alienate potential AM listeners as they false sense stereo (or mono) due to collisions of a stations' own object-reradiated AM waves and with co-channel (even monophonic vs monophonic stations) interference as happens on my 1989 Ford/Lincoln Motorola system radio.

In Paragraph 3 of The Docket, the FCC states they cannot choose a single stereo system. Although not chartered to be a consumer organization, the FCC feels that because some consumers have had single system AM stereo receivers sold to them; that because some AM broadcasters use the Motorola system; that because other countries have chosen the Motorola system, that the FCC should pick the Motorola system.

Utilizing this logic, MILLIONS of consumers have chosen NOT to purchase the currently available phase type AM Stereo receiver, and THOUSANDS of broadcasters have either not chosen the Motorola system or have abandoned it. If the FCC' logic were to prevail, it would have NO alternative but to propose a dual-simulcast AM stereo system utilizing two monophonic transmitting frequencies and stations! Further, in no country mentioned with the Motorola system has the condition of the AM band improved.

WHEREAS the FCC has failed to propose a technical AM stereo system which can immediately [as opposed to 'when AM Improvement is complete'] be used by all broadcasters subject or not to co-channel interrelationships;
WHEREAS the FCC has failed to propose an AM stereo system which may be received in stereo over all broadcasters ENTIRE coverage area;
WHEREAS the FCC has failed to propose an AM stereo system which prevents receiver falsing in both mono and stereo modes while listening to both mono and stereo AM stations,
AND IN CONSIDERATION of the importance of the continued survival of AM radio as demonstrated in hurricanes Hugo and Andrew, it is requested that the FCC NOT continue on its' path of destructive decisions. Instead the FCC is urged to require comments on the suitability of all AM stereo systems under consideration from an independent outside technical agency such as the National Bureau of Standards to assure the most rewarding AM stereo system <u>to the consumer</u> as well as the broadcaster which meets all applicable FCC Rules and Regulations.

The FCC should weigh heavily the known proven unproductive results the mandated Motorola type AM Stereo standard has had in six countries worldwide. Docket 92-298 should be recalled and rewritten to propose an AM Stereo standard that is not involved in litigation that could end any implementation of AM Stereo which would require an explanation to Congress. The chosen system should not be phase dependent, thus enabling operation in the entire coverage areas of all AM stations in a stable stereo mode under all conditions of interference. Such a phase independent AM Stereo system would operate without falsing receivers toward either monophonic or stereophonic operation.

One system which meets the needs of the consumer as well as the broadcaster would be the KAHN Independent Sideband System.

Respectfully submitted,

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